

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

February 08, 2008

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Theresa Giurlando,

Plaintiff,

- against -

T.C. Ziraat Bankasi A.Ş.

Defendant.
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No. 07 CV 10266 (RJS)

DECLARATION OF
YURDAGUL RUZGAR
IN SUPPORT OF DEFENDANT'S
MOTION TO DISMISS

I, Yurdagül Rüzgar, hereby declare as follows:

1. I am First Legal Counsel at T.C. ZIRAAT BANKASI A.Ş. ("Ziraat Bankasi" or the "Bank"). I make this declaration in support of the Bank's motion to dismiss the complaint.

Background of Ziraat Bankasi

2. T.C. Ziraat Bankasi A.Ş. is a joint-stock company whose stock is wholly owned by the government of Turkey. The Bank's headquarters are located in Ankara, Turkey.

3. T.C. Ziraat Bankasi A.Ş. is the biggest and the oldest bank in Turkey. As of December 31, 2008, it has 1,145 branches, 70 Special Operational Centers, 27 bureaus and over 20,872 employees servicing more than 20 million customers.

4. The historical roots of the Bank, whose name may be translated as "Agriculture Bank of Turkey," date back to the Ottoman Empire when it was formed as the first agricultural financial institution founded and guaranteed by the state. While the Bank continues to provide steadfast financial support for agriculture, it also provides banking services to a diverse array of merchants, businessmen, entrepreneurs, pensioners, and employees and businesses.



The Underlying Dispute

5. I understand that the dispute that gives rise to this lawsuit involves a bank account opened by Mrs. Theresa Giurlando and Mr. Mevlut Cicek at the Bank's Eski Istasyon branch in Adana, Turkey.

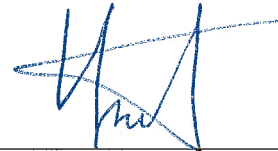
6. Because this case involves a dispute between the Bank and a Bank customer arising from acts in Turkey, it is appropriate for the dispute to be resolved in a Turkish commercial court.

7. If Mrs. Giurlando submits her lawsuit to a Turkish commercial court, the Bank will consent to the court's jurisdiction over this dispute and the Bank will not challenge the appropriateness of Turkey as the forum for litigating this action.

8. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on February 08, 2008
Ankara, Turkey

Signed: _____



Yurdagül Rüzgar